

SHER TREMONTE LLP

July 26, 2021

BY ECF

The Honorable Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

*So ordered  
7-28-21  
Alvin Hellerstein*

Re: *United States v. Jona Rechnitz*, 16 Cr. 389 (AKH)

Dear Judge Hellerstein:

We write on behalf of our client, Jona Rechnitz, the defendant in the above-referenced matter, to respectfully request a modification to the Order dated July 21, 2021, regarding Mr. Rechnitz's upcoming travel to Israel, Dkt. #144. Our previous request erroneously stated that Mr. Rechnitz's travel dates were August 2 to August 6, 2021; in fact, the planned travel has him leaving on August 1, arriving in Israel on August 2, and returning on August 9. We apologize for the error. In an abundance of caution, we respectfully request that Your Honor modify the Court's prior Order to clarify that Mr. Rechnitz is permitted to travel from August 1 to August 9. As previously noted, the government consents to the request on the condition that Mr. Rechnitz surrender his wife's passport, which he will do this week.

We appreciate the Court's consideration.

Respectfully submitted,

/s/Noam Biale  
Michael Tremonte  
Noam Biale

*Attorneys for Jona Rechnitz*

cc: All counsel of record (by ECF)